

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MORRIS BEATTY	:	VIOLATIONS:
	:	21 U.S.C. § 841(a)(1)
	:	(Possession with the intent to
	:	distribute marijuana) --
	:	1 count
	:	18 U.S.C. §§ 922(g)(1)
	:	& 924(e)(1)
	:	(Possession of firearm by a
	:	convicted felon) -- 1 count
	:	21 U.S.C. § 853
	:	(Notice of Forfeiture)

**I N D I C T M E N T**

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

On or about December 15, 1998, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**MORRIS BEATTY**

knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I narcotic drug controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 1998, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**MORRIS BEATTY**

having been previously convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a Jennings Firearms Bryco 59 9MM handgun, bearing serial number 1049110, loaded with 13 rounds of ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

NOTICE OF FORFEITURE

1. The factual allegations contained in Counts One through Two of this Indictment are incorporated by reference and realleged here.

2. As a result of the violation of Title 21, United States Code, Section 841(a)(1) described in Count One of this Indictment, defendant

**MORRIS BEATTY**

shall forfeit to the United States any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of that violation including, but not limited to, a Jennings Firearms Bryco 59 9MM handgun bearing serial number 1049110 loaded with 13 rounds of ammunition, which was recovered from the defendant on or about December 15, 1998.

3. In the event the forfeitable property described in Paragraph 2 above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value;  
or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21,

United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 853.

A TRUE BILL:

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FOREPERSON

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MICHAEL R. STILES  
United States Attorney